

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

DENNIS SMITH,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 98-639-JJF
	)	
EX-POLICE CHIEF GUY D.	)	
BAYNARD,	)	
	)	
Defendants.	)	

**DEFENDANT'S PROPOSED VOIR DIRE**

Defendant, pursuant to D. Del. L.R. 47.1(a), submits the following proposed questions to be asked of the jurors during voir dire in addition to the Court's standard questions:

1. Have you, a friend or family member ever made a claim against a police officer or municipality for an improper or false arrest?
2. Have you, a friend or family member ever had an experience with a police officer or a police department in which there was a claim or suggestion that the police did not act properly in some fashion?
3. Have you had any experience with a police officer which would affect your ability to render a fair and impartial verdict in a case involving the actions of a police officer?

**AKIN & HERRON, P.A.**

/s/Bruce C. Herron  
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Dated: June 5, 2006

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